

Date: January 23, 2014

To: The Nebraska Council on Teacher Accreditation.

From: Reece L. Peterson, on behalf of the faculty of special education, University of Nebraska-Lincoln

Re: Regarding the Proposed Specialty Endorsements, and the Behavior Intervention Specialty Endorsement in Particular.

The journey to rethink and create an altogether new set of special education endorsements for Nebraska has been a long and winding one. The thinking was to replace the structure of endorsements which had been in place since about the beginning of special education in Nebraska with something which might better match modern realities. It would provide an avenue to bring the best possible specialized research and intervention strategies to be available to students with disabilities in Nebraska. It also might reinvigorate a stagnant and less than appealing special education preparation, and attract new educators into specialization by offering them chances to for career advancement and to build and be recognized for specialized expertise upon general competence in special education.

As a result the faculty of the UNL special education program strongly supports the overall plan for special education specialty area endorsements, including all of the specialty areas and the special education supervisor administrative endorsement.

While we support the overall plan we do not support the 11<sup>th</sup> hour addition of a paragraph (006.59D1) to the previously agreed upon behavior intervention specialist endorsement. This paragraph would apparently circumvent the need for a special education endorsement “foundation” on which to build a specialty area and defeats the entire ideas of the specialty areas.

We strongly object to the inclusion of this paragraph for the following reasons:

- It circumvents the entire concept of specialty area expertise being built on a sound “foundation” of special education knowledge.
- It ignores and does not address the basic standards of professional practice of the Council for Exceptional Children. The CEC standards of the behavior intervention specialist were predicated on meeting the basic core CEC standards for special education via the “special education endorsement.” The behavior specialty standards would be above and beyond that content. It is not possible with any degree of integrity to address all of the CEC foundational standards in the

12 credit hours of this paragraph. If this were possible the special education (generalist) endorsement should be 12 credit hour of special education instead of 30.

- Since no foundational standards are included for this proposed route to a behavior specialist endorsement it is unclear how NDE would have a rational basis to make decisions about institutional applications to offer this route to a specialty area endorsement.
- It ignores the unanimous recommendation of the work group for this specialty area which was to require a special education “generalist” teaching certificate or equivalent. No such “11th hour” proposal was even discussed in the more than two year process of discussing these concepts with a wide range of stakeholders, and no rationale or explanation for this last minute change was provided to stakeholders.
- It certainly makes it difficult for NCTE to be considered a rational and deliberate organization when it makes changes which are in absolute contradiction to the recommendations of its own more than two years of professional deliberation, meetings and recommendations. Moreover doing so at the last possible time for change, and at a time which allows minimal discussion or input from the professional community.

For these reasons we strongly urge the council to delete this paragraph behavior intervention specialist endorsement, and move forward to implement this and the other specialty areas as originally proposed.

If the Council would decide to not remove the paragraph of concern from the behavior specialist, we would request that it be removed from the list of specialty endorsements and maintain its original endorsement title “behavioral disorders” as that title reflects the fact that it could be an initial special education endorsement, maintaining essentially the previous number of credit hours. As proposed with the paragraph in question it is not a “specialty”.

The final alternative would be to refer this endorsement back to the stakeholder groups for further consideration.